

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 1:23-CV-23730 RAR

UNITED STATES OF AMERICA,

Plaintiff,

v.

ALL ASSETS ON DEPOSIT AND RESTRAINED IN
BROKERAGE ACCOUNT NO. 20010195
AT SAFRA NATIONAL BANK OF NEW YORK;

ALL ASSETS ON DEPOSIT AND RESTRAINED IN
CORPORATE CHECKING ACCOUNT NO. 1727126
AT SAFRA NATIONAL BANK OF NEW YORK; AND

ALL ASSETS ON DEPOSIT AND RESTRAINED IN
CORPORATE CHECKING ACCOUNT NO. 17271253
AT SAFRA NATIONAL BANK OF NEW YORK.

Defendants *In Rem*.

/

NOTICE OF CHARGING LIEN

COFFEY BURLINGTON PL and HILARIE BASS PLLC as counsel of record for
INSTITUTO DE SEGURIDAD SOCIAL DE LA POLICIA NACIONAL (“ISSPOL”), hereby
claim a charging lien on any settlement, judgment or payment to ISSPOL or its successor(s) or
assignee(s) arising from this action. The lien is for payment for costs and expenses advanced by,
and legal services performed by counsel in prosecution of ISSPOL’s claims for which they have
not been compensated.

The requirement for a valid charging lien are met. *See Burton v. Carnival Corp.*, 916 F.
Supp. 2d 1262, 1268 (S.D. Fla. 2012). First, there is an express contract between counsel and
ISSPOL. Second, there was an express understanding that payment was contingent on recovery

and would be paid from recovery in this action. Third, there exists a potential disagreement as to the amount of the fee owed to counsel. Fourth, this notice is timely as the dispute has just arisen and payment of the agreed settlement to ISSPOL has not yet occurred.

This Notice is being filed and sent (separately) to ISSPOL.

Respectfully submitted,

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Co-Counsel for ISSPOL

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by Notice of Electronic Filing generated by CM/ECF, on April 15, 2025, on all counsel or parties of record on the Service List below.

By: /s/Kendall Coffey

Service List	
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